

REMARKS/ARGUMENTS

The rejections presented in the Office Action dated April 9, 2007 (hereinafter Office Action) have been considered, and reconsideration of the pending claims and allowance of the application in view of the present response is respectfully requested.

With respect to the objection to Fig. 4, Applicant respectfully traverses. The cited rule indicates that descriptive labels may be required where necessary for an understanding of the drawing. As the objects identified by reference numerals 401-408 are images as discussed in paragraph [0034] the further labeling of each box 401-408 as “image” would not appear to be necessary for an understanding of Fig. 4. Applicant accordingly requests that the objection be removed.

With respect to the §112 rejection of Claims 5-7 and 16-18, the claims have been amended to remove the phrase “sufficiently close” and to indicate that the lock state is changed when a detected object selection order differs from a determined user-specific inter-object internal order by a predetermined parameter. Support for the amended claim language may be found in the Specification, for example, at paragraphs [0023] and [0037]; therefore, these changes do not introduce new matter. The claims are believed to be patentable over the asserted reference for the reasons set forth below.

Applicant respectfully traverses the §102(b) rejection based upon the teachings of U.S. Patent No. 6,209,104 to Jalili (hereinafter “Jalili”) because Jalili does not teach or suggest each of the claimed limitations. For example Jalili does not teach or suggest determining at least one user-specific inter-object internal order of objects in a database. At column 7, lines 4-23, Jalili teaches that icons within an icon scheme may be varied, but Jalili’s icon schemes each represent a self-contained manner of displaying the elements of a password. There is no overlying order of the icons between the different schemes (asserted as the database of predetermined objects) such that Jalili does not teach determining an inter-object internal order in the database.

In addition, in an effort to facilitate prosecution and without acquiescing to characterizations of the asserted art, Applicant’s claimed subject matter, or to the applications of the asserted art or combinations thereof to Applicant’s claimed subject

matter, Applicant has amended independent Claims 1 and 11 to indicate that the internal order is an order of the predetermined objects in the database and that the objects displayed are a random subset of the predetermined objects. The dependent claims have also been amended to provide language consistent with these changes. Support for these changes may be found in the instant Specification, for example, at paragraphs [0016] and [0017]; and therefore, the changes do not introduce new matter. Moreover, Jalili does not teach at least displaying a random subset of predetermined objects as Jalili teaches displaying icons from a set scheme. As Jalili does not teach or suggest determining an order of objects in a database or displaying a random subset of such objects, as now claimed, Applicant requests that the §102(e) rejection be withdrawn.

Dependent Claims 2-10 and 12-22 depend from independent Claims 1 and 11, respectively, and also stand rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Jalili. While Applicant does not acquiesce with the particular rejections to these dependent claims, these rejections are also improper for the reasons discussed above in connection with independent Claims 1 and 11. These dependent claims include all of the limitations of their respective base claims and any intervening claims and recite additional features which further distinguish these claims from the cited reference. Therefore, the rejection of dependent Claims 2-10 and 12-22 is improper.

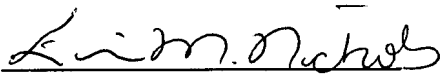
Authorization is given to charge Deposit Account No. 50-3581 (NKO.014.US) any necessary fees for this filing.

If the Examiner believes it necessary or helpful, the undersigned attorney of record invites the Examiner to contact the undersigned attorney to discuss any issues related to this case.

Respectfully submitted,

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By: 

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